

OPTIONAL FORM 99 (7-90)

FAX TRANSMITTAL

of pages 13

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CORRESPONDENCE/MEMORAND

To	Lynn Slugantz	From	Susan Zazzali
Dept./Agency	913 551 7883	Phone #	406 441 1130 x226
Fax #	913 551 7947	Fax #	1125
NSN 7540-01-317-7368		5099-101	
GENERAL SERVICES ADMINISTRATION			

DATE: July 30, 1996

TO: Stainless Foundry & Engineering Co, Inc.

FROM: Sandra Miller

SUBJECT: Compliance Inspection



1069550 - R8 SDMS

On July 29, 1996, Sandra Miller met with Dianne Miller, environmental specialist, Dan Brockington, Plant Engineer, and Ken Kaszubowski, Sigma Environmental at Stainless Foundry & Engineering Co, Inc located at 5150 N. 35th Street in Milwaukee, Wisconsin. Miller told the group that the purpose of the meeting was to conduct a hazardous waste compliance inspection and follow up on an inquiry by EPA Region VIII about shipping waste to Asarco, a lead smelter in Montana.

Brockington said that Stainless Foundry & Engineering is a sand and investment casting foundry. Stainless Foundry can cast up to 300 different grades of stainless steel, but typically makes 180 grades. The company has been in business for 50 years, operates 3 shifts and employs about 400 workers.

Brockington said the sand casting operation uses beach sand, clay and water. Brockington said that in investment casting, a pattern is used to make a wax mold. The mold is dipped in about 10 to 12 layers of ceramic. The wax is melted and drained from the ceramic casting. After the ceramic is hardened by heating, the metal is poured in the ceramic casting and allowed to cool. The ceramic is then broken off the metal. Residual ceramic left on the metal is removed by dipping the metal in a Kolene bath (a sodium hydroxide solution manufactured by the Kolene Corp. which is heated to about 900°F). The sludge from the kolene bath is placed in trays to harden. The 75 pound blocks of kolene sludge are wrapped in plastic, placed into plastic lined 55 gallon drums and disposed of as hazardous waste. The rinse water from the kolene process is treated for copper, oil and grease before it is discharged to the sanitary sewer.

The other hazardous waste is generated from a parts washer in maintenance. Stainless Foundry switched to a high flash solvent from Safety Kleen at the beginning of the year. S. Miller explained to Brockington and D. Miller that Safety Kleen classifies the high flash solvent as D039 waste and that Stainless Foundry may want to analyze the solvent to verify that waste classification.

Brockington said Stainless Foundry has been an investment foundry for about 20 years. Brockington said the kolene process has been used for about the last 15 to 20 years. Brockington and D. Miller have been with Stainless Foundry for about 8 years and are most familiar with the procedures during that time.

D. Miller said that in about 1988 or 1989, an outside broker, Joe Shiller of Environmental Services, Minneapolis, MN, suggested that Stainless Foundry use Asarco as a disposal site for the kolene waste. D. Miller said that Stainless Foundry started to ship the kolene waste to the Asarco smelter in Glover, Missouri sometime thereafter. D. Miller said that towards the end of 1995, Glendon Archer, Manager of the Ore Department at the Asarco corporate office in New York, called her. Archer told D. Miller that the Missouri smelter could no longer use the Kolene waste in their process and that Stainless Foundry should send the waste to the Asarco smelter in Montana instead. D. Miller said that the details associated with the waste shipments and the contract between Asarco and Stainless Foundry are handled by the corporate office. D. Miller said she contacted someone in the shipping department at the Asarco Montana facility to check on the details of sending a shipment of



kolene waste. D. Miller said that Stainless Foundry then proceeded to send two shipments of kolene waste to the Asarco, Montana facility. One shipment occurred in February, 1996 and the other shipment occurred in April, 1996.

D. Miller said that on about June 4th, 1996, John Nickel, environmental manager at the Asarco Montana facility, called her. Nickel told D. Miller that they were rejecting the kolene waste manifested to the Asarco Montana facility on April 1, 1996. D. Miller said that Nickel told her that there is a difference between a waste and a waste that can be recycled. D. Miller said that Nickel told her that they did not want the kolene waste because it was manifested to the Asarco facility. D. Miller said that after talking with Nickel, she called the Asarco corporate office. The corporate office told her that if Stainless Foundry could get an exemption, the Asarco Montana facility might take the kolene waste. D. Miller called John Nickel back to discuss the phone conversation she had with corporate. D. Miller said that Nickel made it clear that the load would be rejected and would be transported back to Stainless Foundry. D. Miller said the waste shipment was transported back to Stainless Foundry from the Asarco Montana facility. D. Miller said the drums contained the individually wrapped kolene blocks. D. Miller said the drums were marked with the yellow DOT hazardous waste labels which were removed from the drums after they were emptied. D. Miller said the waste in the drums was placed in a lugger box and sent to AETS in Menomonee Falls.

D. Miller and Brockington said that Asarco said they used the kolene sludge as a flux to separate the copper during the smelting operation. D. Miller and Brockington said that after the mix up with the rejected load, Stainless Foundry decided not to send any more kolene waste to Asarco. Brockington and D. Miller said Stainless Foundry paid the Asarco Missouri facility \$50 per ton plus transportation for disposal of the kolene sludge. Stainless Foundry paid the Asarco Montana facility \$75 per ton plus transportation. Brockington and D. Miller said that with transportation, it cost Stainless Foundry about \$250 per ton to dispose of the kolene sludge. Brockington said it is cheaper to send the waste to AETS, which stabilizes the waste and landfills it. Brockington said Chemical Waste Management (AETS) required a TCLP analysis on the waste before they would accept it because the May, 1989 analysis included the EP toxicity method.

S. Miller asked D. Miller if Asarco required an analysis of the kolene sludge. D. Miller said that a copy of the Chemical Waste Management waste profile dated May 9, 1989 was sent to Asarco when the disposal arrangements were first made in the late 1980's or early 1990's. D. Miller said that Asarco has continued to accept the kolene sludge based on the May 9, 1989 analysis, even when the waste was sent to the Montana facility instead of the Missouri facility.

D. Miller said that after Walt Ebersohl, DNR, contacted her at the beginning of July, 1996, she called the Asarco Montana facility and requested a copy of manifest #WIJ530703 that was signed by the receiving facility (copy 5). D. Miller produced copy 5 which was sent by Asarco in response to her request. D. Miller acknowledged that the manifest was not signed by the Asarco Montana facility. S. Miller advised D. Miller to submit an exception report, as required by NR 615.11(2), Wisc. Admin. Code.

D. Miller provided S. Miller with the following documents: copies 2 and 5 of the February manifest to the Asarco Montana facility; the Chemical Waste Management, Inc. waste profile for the kolene sludge dated May 9, 1989; the agreement between Stainless Foundry and Asarco dated January 11, 1996; the emergency action plan dated November 3, 1994; and, information from the Kolene Corp. on sludge treatment.



STATE OF WISCONSIN

 Chapter 144, Wis. Stats.
Form 4400-86P

Rev. 10-93

 State of Wisconsin
Department of Natural Resources
Bureau of Solid and Hazardous Waste Mgt.
Box 8094
Madison, Wisconsin 53708

FOR DNR USE ONLY

 ALL COPIES MUST BE LEGIBLE,
PLEASE TYPE

Form designed for use on elite (12-pitch) typewriter.

Form Approved OMB No. 2050-0098. Expires 9-30-94

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. WID806084966		Manifest Document No. 01010118		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.					
3. Generator's Name and Mailing Address Stainless Foundry & Engineering Co., Inc. 5150 N. 35th Street Milwaukee, WI. 53209						Site Location If Different							
4. Generator's Phone (414) 462-7400						A. State Manifest Document Number WIJ530703							
5. Transporter 1 Company Name TRI STATE MOTOR TRANSIT CO.						B. State Generator's ID 01010118							
6. US EPA ID Number MOD095038998						C. State Transporter's ID							
7. Transporter 2 Company Name						D. Transporter's Phone 1-800-641-							
8. US EPA ID Number						E. State Transporter's ID 7580							
9. Designated Facility Name and Site Address ASARCO, INC. EAST HEKENA PLANT EAST HEKENA, MT. 59635						F. Transporter's Phone							
10. US EPA ID Number MTD006230346						G. State Facility's ID							
						H. Facility's Phone 406-227-7188							
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)						12. Containers No. Type		13. Total Quantity		14. Unit wt/vol		15. Waste No.	
a. CORROSIVE SOLID N.O.S., 8, UN1759, PGII (Sodium Hydroxide)						0, 8, 2DM		4, 26, 5, 0		P		D 002 D 007	
b.													
c.													
d.													
J. Additional Descriptions for Materials Listed Above Caustic Soda Slag Containing Sodium Hydroxide & Chromium						K. Handling Codes for Wastes Listed Above							
16. Special Handling Instructions and Additional Information EMERGENCY RESPONSE DYNEX 1-800-800-2385 ERG # 60													
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations and according to the requirements of the Wisconsin Department of Natural Resources. If I am a large quantity generator, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment. OR, If I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.													
Printed/Typed Name & Position Title ENVIRONMENTAL SPECIALIST DIANNE MILLER						Signature <i>Dianne Miller</i>						Date Month Day Year 02/12/96	
17. TRANSPORTER 1 Acknowledgement of Receipt of Materials						Signature <i>L. W. Whitlock</i>						Date Month Day Year 02/12/96	
Printed/Typed Name & Position Title L. W. WHITLOCK						Signature						Date Month Day Year	
18. TRANSPORTER 2 Acknowledgement of Receipt of Materials						Signature						Date Month Day Year	
Printed/Typed Name & Position Title						Signature						Date Month Day Year	
19. Discrepancy Indication Space													
20. FACILITY OWNER OR OPERATOR: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.													
Printed/Typed Name & Position Title						Signature						Date Month Day Year	

A Form 8700-22 (Rev. 9-88) Previous editions are obsolete.

 Copy Distribution: 1 - Generator send to Wis. DNR
2 - Generator retain
3 - Facility send to Wis. DNR
Copies 1 & 3 mail to Wis. DNR at above address.

 4 - Facility retain
5 - Facility send to Generator
6 - Transporter retain

 Emergency 24 Hour Assistance Telephone Number
Wisconsin (800) 286-3282
Outside Wisconsin (800) 424-8802

 COPY 2 -
GENERATOR RETAIN

STATE OF WISCONSIN

Chapter 144, Wis. Stats.
Form 4400-88P

Rev. 10-93

State of Wisconsin
Department of Natural Resources
Bureau of Solid and Hazardous Waste Mgt.
Box 8094
Madison, Wisconsin 53708

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ALL COPIES MUST BE LEGIBLE,
PLEASE TYPE

Designed for use on elite (12-pitch) typewriter.

Form Approved. OMB No. 2050-0039. Expires 9-30-94

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8. Generator's Name and Mailing Address Stainless Foundry & Engineering Co., Inc. 5150 N. 35th Street Milwaukee, WI 53209 Generator's Phone 414 462-7400						Site Location If Different			
6. Transporter 1 Company Name TRI STATE MOTOR TRANSIT CO.						6. US EPA ID Number WOD005028002		A. State Manifest Document Number WIJ530703	
7. Transporter 2 Company Name						8. US EPA ID Number		B. State Generator's ID	
9. Designated Facility Name and Site Address ASARCO, INC. EAST HEBENA PLANT EAST HEBENA, MT. 59635						10. US EPA ID Number MTD006230346		C. State Transporter's ID	
								D. Transporter's Phone 800-641-7580	
								E. State Transporter's ID	
								F. Transporter's Phone	
								G. State Facility's ID	
								H. Facility's Phone 408-227-7188	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)						12. Containers No. Type		13. Total Quantity	
a. CORROSIVE SOLID N.O.S., 8, UN1759, PGII (Sodium Hydroxide)						0, 8, 2DM		4, 25, 5, 0 P	
b.									
c.									
d.									
J. Additional Descriptions for Materials Listed Above Caustic Soda Slag Containing Sodium Hydroxide & Chromium						K. Handling Codes for Wastes Listed Above B 887			
15. Special Handling Instructions and Additional Information EMERGENCY RESPONSE DYNEX 1-800-800-2385 ERG # 60									
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations and according to the requirements of the Wisconsin Department of Natural Resources. If I am a large quantity generator, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.									
Printed/Typed Name & Position Title ENVIRONMENTAL SPECIALIST DIANNE MILLER						Signature		Date Month Day Year	
17. TRANSPORTER 1 Acknowledgement of Receipt of Materials								Date	
Printed/Typed Name & Position Title DAVID MILLER						Signature		Month Day Year 07/11/96	
18. TRANSPORTER 2 Acknowledgement of Receipt of Materials								Date	
Printed/Typed Name & Position Title						Signature William W. Whitehouse		Month Day Year	
19. Discrepancy Indication Space									
20. FACILITY OWNER OR OPERATOR: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.									
Printed/Typed Name & Position Title						Signature		Date Month Day Year	
Form 8700-22 (Rev. 9-88) Previous editions are obsolete.									
Copy Distribution: 1 - Generator send to Wis. DNR 2 - Generator retain 3 - Facility send to Wis. DNR Copies 1 & 3 mail to Wis. DNR at above address.									
Agency 24 Hour Assistance Telephone Number Wisconsin (800) 266-8232 Wisconsin (800) 424-8802									
COPY 5- FACILITY SEND TO GENERATOR									
4 - Facility retain 5 - Facility send to Generator 6 - Transporter retain									



GENERATOR'S WASTE MATERIAL PROFILE SHEET

PLEASE PRINT IN INK OR TYPE (Elle, 12-pitch).



Items in Red
Verbal to Debbie Muench
6-16-99
CWM Location of Original: _____



CWD

F66479

Waste Profile Sheet Code

CWM Location of Original:

ACL

(SHADED AREAS FOR CWM USE ONLY)

CWM Sales Rep. #:

A. GENERAL INFORMATION

1. Generator Name: Stainless Foundry & Eng., Inc. 2. Generator USEPA ID: WI D006084966
3. Facility Address: 5150 North 35th Street 4. Generator State ID: WI
Milwaukee, Wisconsin
5. Zip Code: 53209
6. Technical Contact: Ron Bird 7. Title: Technical Director 8. Phone: (414) 462-7400

B. MAIL CHEMICAL WASTE MANAGEMENT, INC. INVOICES TO

B. MAIL CHEMICAL WASTE MANAGEMENT, INC. INVOICES TO 1. ☒ Generating Facility (A, above), or
2. Company Name: _____ 3. Phone: () _____ - _____
4. Address: _____

5. Zip Code: _____

C. 1. NAME OF WASTE Kolene Furnace Sludge

2. PROCESS GENERATING WASTE Kolene Salt Bath Furnace

3. Is this waste a Dioxin listed waste as defined in 40 CFR 261.31 (e.g., F020, F021, F022, F023, F026, F027, or F028)?

☐ Yes ☒ No If yes, **DO NOT COMPLETE** this form. Contact your Chemical Waste Management, Inc. sales representative for assistance.

D. PHYSICAL CHARACTERISTICS OF WASTE

1. Color: <u>Yellow/</u> <u>Green</u>	2. Does the waste have a strong incidental odor? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes If known, describe: _____	3. Physical State @ 70°F: <input checked="" type="checkbox"/> Solid <input type="checkbox"/> Semi-Solid <input type="checkbox"/> Liquid <input type="checkbox"/> Powder Other: _____	4. Layers: <input type="checkbox"/> Multilayered <input type="checkbox"/> Bi-layered <input checked="" type="checkbox"/> Single Phased	5. Specific Gravity: <u>1.2 - 1.7</u> Range: <u>1.5 - 1.7</u>	6. Free Liquids: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Volume: _____ %
---	---	---	---	---	--

7. pH: ☐ ≤ 2 ☐ $> 2-4$ ☐ 4-7 ☐ 7 ☐ 7-10 ☐ 10- < 12.5 ☒ ≥ 12.5 ☐ Range _____ ☐ NA

8. Liquid Flash Point: ☐ < 73°F ☐ 73-99°F ☐ 100-139°F ☐ 140-199°F ☒ ≥ 200°F ☐ None ☐ Closed Cup ☐ Open Cup

E. CHEMICAL COMPOSITION

[illegible]

Please note: The chemical composition total in the maximum column must be greater than or equal to 100%. T

TOTAL: 105 %

2. Indicate if this waste contains any of the following:

	NONE	or	LESS THAN	or	ACTUAL
PCB's	<input checked="" type="checkbox"/>		<input type="checkbox"/> < 50 ppm		_____ ppm
Cyanides	<input type="checkbox"/>		<input checked="" type="checkbox"/> < 50 ppm		_____ ppm
Phenolics	<input type="checkbox"/>		<input checked="" type="checkbox"/> < 50 ppm		_____ ppm
Sulfides	<input type="checkbox"/>		<input checked="" type="checkbox"/> < 50 ppm		_____ ppm

F. METALS Indicate if this waste contains any of the following:

1. <input type="checkbox"/> EP TOX/TCLP		or	2. <input checked="" type="checkbox"/> Total	
METAL	LESS THAN	or	ACTUAL	
(Parts Per Million)				
Arsenic	<input checked="" type="checkbox"/> < 5	<input type="checkbox"/> < 500	_____	
Barium	<input checked="" type="checkbox"/> < 100		_____	
Cadmium	<input checked="" type="checkbox"/> < 1	<input type="checkbox"/> < 100	_____	
Chromium	<input type="checkbox"/> < 5		621 (31-5)	
Lead	<input checked="" type="checkbox"/> < 5	<input type="checkbox"/> < 500	_____	
Mercury	<input checked="" type="checkbox"/> < 0.2	<input type="checkbox"/> < 20	_____	
Selenium	<input checked="" type="checkbox"/> < 1	<input type="checkbox"/> < 100	_____	
Silver	<input checked="" type="checkbox"/> < 5		_____	
Chromium-Hex	<input type="checkbox"/> < 5	<input type="checkbox"/> < 500	(23 EP)	
Copper	<input type="checkbox"/> < 5		20-10	
Nickel	<input type="checkbox"/> < 5	<input checked="" type="checkbox"/> < 134	_____	
Thallium	<input checked="" type="checkbox"/> < 5	<input type="checkbox"/> < 130	_____	
Zinc	<input checked="" type="checkbox"/> < 5		_____	

Side 1 of 2

TURN PAGE AND COMPLETE SIDE 2

Form CWM-6000 © 1987 Chemical Waste Management, Inc.

98%

P. 06

GENERATOR'S WASTE MATERIAL PROFILE SHEET (Continued)

Waste Profile Sheet Code

G. OTHER HAZARDOUS CHARACTERISTICS

1. Is this waste a listed solvent waste as defined by 40 CFR 261.31 (F001, F002, F003, F004, or F005)? ☐ Yes ☒ No
2. Does this waste contain greater than 1000 ppm total halogenated organic compounds? ☐ Yes ☒ No
3. Indicate if this waste is any of the following:

- ☐ RCRA Reactive ☐ Radioactive
☐ Water Reactive ☐ Etiological
☐ Explosive ☐ Pesticide Manufacturing Waste
☐ Shock Sensitive ☐ Other _____
☐ Pyrophoric ☒ None of the above

H. COMPLETE ONLY FOR WASTES INTENDED FOR FUELS or INCINERATION

	LESS THAN	or	ACTUAL
Beryllium	<input type="checkbox"/> < 5000 ppm		_____ ppm
Potassium	<input type="checkbox"/> < 5000 ppm		_____ ppm
Sodium	<input type="checkbox"/> < 5000 ppm		_____ ppm
Total Bromine	<input type="checkbox"/> < 2 %		_____ %
Total Chlorine	<input type="checkbox"/> < 35 %		_____ %
Total Fluorine	<input type="checkbox"/> < 1 %		_____ %
Total Sulfur			_____ %

I. OPTIONAL — RECLAMATION, FUELS, OR INCINERATION PARAMETERS Provide if information is available.

Range

1. Heat Value (BTU/lb): _____ 2. Water: _____ %
3. Viscosity (cps): _____ @ ☐ _____ °F ☐ 100°F ☐ 150°F
4. Ash: _____ % 5. Settleable solids: _____ %
6. Vapor Pressure @ STP (mm/Hg): _____
7. Is this waste a pumpable liquid? ☐ Yes ☐ No
Type of pump? _____
8. Can this waste be heated to improve flow? ☐ Yes ☐ No
9. Is this waste soluble in water? ☐ Yes ☐ No
10. Particle size: Will the solid portion of this waste pass through a 1/8 inch screen? ☐ Yes ☐ No

J. TRANSPORTATION INFORMATION

1. Is this a DOT Hazardous Material? ☒ Yes ☐ No 2. Anticipated Annual Volume/Units: 108cu.yd/ year
3. Proper Shipping Name: RQ Waste Corrosive Solid NOS
4. Hazard Class: Corrosive Material 5. I.D. #: UN1759
6. Additional Description: (_____)
7. Method of Shipment: ☐ Bulk Liquid ☒ Bulk Solid ☐ Drum (Type/Size): _____ Other: _____
8. CERCLA Reportable Quantity (RQ): 1000 9. RQ Units (lb/kg): 1000/#
10. USEPA Hazardous Waste? ☒ Yes ☐ No 11. USEPA Hazardous Waste Number(s): D002, D007
12. State Hazardous Waste? ☒ Yes ☐ No 13. State Hazardous Waste Number(s): D002, D007

K. SPECIAL HANDLING INFORMATION

☐ Additional Page(s) Attached

L. GENERATOR CERTIFICATION I hereby certify that all information submitted in this and all attached documents contains true and accurate descriptions of this waste material, and all relevant information regarding known or suspected hazards in the possession of the generator has been disclosed.

1. Charles R. Bird
Signature

2. Technical Director
Title

3. Charles R. Bird
Name (Type or Print)

4. May 9, 1989
Date

Side 2 of 2

Form CWM-6000 © 1987 Chemical Waste Management, Inc.

GENERATOR'S CERTIFICATION OF REPRESENTATIVE SAMPLE

PLEASE PRINT IN INK OR TYPE (Eiko, 12-pitch).



CWD

F66479

Waste Profile Sheet Code

CWM Location of Original: ACL

(SHARED AREAS FOR CWM USE ONLY)

CWM Sales Rep. #:

CHEMICAL WASTE MANAGEMENT

This completed form must be submitted with the representative sample, to:

4536 ADAMS CENTER ROAD

FORT WAYNE, IN 46806

219/447-5585

ATTN: DEBBIE MUENCH

INSTRUCTIONS FOR COMPLETING THIS FORM ARE FOUND ON THE OPPOSITE SIDE. In order to determine whether Chemical Waste Management, Inc. can accept the special waste described in the Generator's Waste Material Profile Sheet referenced above, you must obtain and supply us with a representative sample of the waste. We may analyze the sample to verify the information that you have provided to us. A representative sample is defined as a sample obtained using any of the applicable sampling methods specified in 40 CFR 261-Appendix I or an equivalent method. Collect a representative sample of your waste and complete the form below. Apply the peel off label and ship your sample along with this form to the address noted above. If you have any questions regarding obtaining a representative sample of your waste, please refer to the instructions for this form, or contact your Chemical Waste Management, Inc. sales representative.

A. SAMPLING METHOD (Indicate which method was employed)

If sampling requirement has been waived by Chemical Waste Management, Inc., do not complete this Generator's Certification of Representative Sample form.

1. ☒ I have obtained a representative sample of the waste material described in the Generator's Waste Material Profile Sheet referenced above according to the sampling methods specified in 40 CFR 261-Appendix I.
2. ☐ I have obtained a representative sample of the waste material described in the Generator's Waste Material Profile Sheet referenced above using a method equivalent to the sampling methods described in 40 CFR 261-Appendix I.

B. SAMPLE SOURCE (e.g., drum, lagoon, pit, pond, tank, vat)INGOT**C. SAMPLE LABEL — COMPLETE LABEL BEFORE REMOVING**

1. Waste Profile Sheet Code:

2. XXXX Generator's Name:3. XXXX Name of Waste:4. XXXX Sample Hour/Date:5. XXXX Sampler's Signature:

Carbonate

95 100

Stainless Foundry & Eng., Inc.

Kolene Furnace Sludge

1230PM 5-9-89

Jameel Dawan

1. Waste Profile Sheet Code:

2. Generator's Name:

3. Name of Waste:

4. ☒ Sample Hour/Date:5. ☒ Sampler's Signature:

621113

6. Print Sampler's Name: Jameel Dawan7. Sampler's Title: Environmental Specialist8. Sampler's Employer (if CWM, see D. below): Stainless Foundry & Eng., Inc. 5150 N 35th St Milwaukee, Wisconsin 53209**D. WITNESS VERIFICATION** (if required) In most circumstances you will be obtaining the sample. However, in those cases in which Chemical Waste Management, Inc. obtains the sample, one of your employees must be present to direct the particular source to be sampled, to witness the sampling, and to complete this Part D.

I was personally present during the sampling described. I directed the waste source to be sampled, and I verify the information noted above.

1. Witness' Signature: _____

2. Witness' Name: _____

3. Witness' Title: _____

4. Witness' Employer: _____

5. Date: _____

AGREEMENT NO. L96011

**STAINLESS FOUNDRY AND ENGINEERING
AND
ASARCO Incorporated**

**CAUSTIC SLAG
DATED: JANUARY 11, 1996**

AGREEMENT NO. L96011

STAINLESS FOUNDRY AND ENGINEERING, 5150 North 35th Street, Milwaukee, Wisconsin 53209-0984 hereinafter called "SHIPPER," agrees to sell.....

AND

ASARCO Incorporated, 180 Maiden Lane, New York, NY 10038, hereinafter called "Asarco," agrees to purchase.....

1. **PRODUCT**

By-product caustic slag produced by Stainless Foundry and Engineering. Product shall be cast in 45 pound ingots.

2. **ANALYSIS**

The product shall substantially assay:

Sodium Hydroxide

3. **QUANTITY**

Approximately 150,000 pounds of material each year.

4. **SHIPMENT**

Product to be shipped in 50 lb. cubes, as it becomes available.

5. **DELIVERY**

Freight prepaid F.O.B. truck at Asarco's East Helena, Montana, plant. The delivery is to be scheduled by appointment, details of which will be mutually arranged.

Truck receiving hours are presently from 8:00 a.m. to 2:00 p.m., Monday through Friday, major holidays excepted.

6. **DURATION**

The period of this agreement shall be February 1, 1996 - January 31, 1997.

7. **TITLE & RISK**

Title and all risks shall pass to Asarco on physical delivery of product. Asarco shall in no way be responsible for any claims, demands, fines, penalties or assessments of whatever nature arising from Asarco's receipt, handling, processing or disposal of product if such claims, demands, fines, penalties or assessments arise from false or

STAINLESS FOUNDRY AND ENGINEERING

AGREEMENT NO. L96011

7. TITLE & RISK (Continued)

misleading statements on the Material Characterization Questionnaire submitted and signed by SHIPPER which questionnaire, accompanying each shipment, is attached hereto and hereby made a part of this agreement. SHIPPER expressly acknowledges and agrees that it will indemnify and hold Asarco harmless from any and all claims, demands, fines, penalties or assessments of whatever nature arising from such false or misleading statement.

8. PAYMENT

No payment shall be made for any metal or content in the product.

9. CHARGE

The charge shall be seventy five dollars (\$75.00) per wet ton of product and containers received, fractions in proportion. Minimum lot charge shall be \$500.00.

10. WEIGHING

Weighing (at which SHIPPER or SHIPPER's representative may be present) as done by Asarco according to Asarco's standard practice at the receiving plant promptly after receipt of product, will be accepted as final. The absence of SHIPPER or SHIPPER's representative shall be deemed a waiver of this right in each instance. After weighing, the product may be placed in process or commingled with other feed stock by Asarco for smelting.

11. SETTLEMENT

Asarco shall invoice SHIPPER for applicable treatment charges by fifth (5th) business day following date of delivery. The invoice shall be due and payable on the fifteenth (15th) business day following date of delivery.

12. DEFINITIONS

A wet ton means a short ton or 2,000 pounds avoirdupois inclusive of moisture.

A business day means a named day in the calendar, Saturdays, Sundays and major holidays excepted.

13. NOTICES

All notices, requests and other communications hereunder shall be in writing and shall be deemed to have been duly given or made when sent by first-class mail,

STAINLESS FOUNDRY AND ENGINEERING

AGREEMENT NO. L96011

13. NOTICES (Continued)

postage prepaid, addressed:

If to Asarco:

Asarco Incorporated
180 Maiden Lane
New York, NY 10038
Attention: Director, Ore Department

copy to:

ASARCO Incorporated
East Helena Plant
East Helena Montana 59635
Attention: Manager

And if to SHIPPER:

Stainless Foundry and Engineering
5150 North 35th Street
Milwaukee, Wisconsin 53209-0984
Attention: Ms. Diane Miller
Telephone: (414) 462-7400
Telecopy: (414) 462-7303

or, in each case, at other such address as may be hereafter or have been designated most recently in writing by the addressee to the addresser.

Any notice given hereunder may be given by telegraph, telefax, or telex and confirmed by mail in due course in which case such notice shall be deemed given or served when sent in telegraphic form.

14. SUCCESSION

This agreement shall bind and inure to the benefit of the parties hereto, their legal representatives, successors and assigns. This agreement shall not be assignable by either party hereto without the written consent of the other. Such consent shall not be unreasonably withheld.

STAINLESS FOUNDRY AND ENGINEERING

AGREEMENT NO. L96011

15. WAIVER

Waiver of any breach of any provision hereof shall not be deemed to be a waiver of any other provision hereof or of any subsequent breach of such provision.

This agreement shall take effect as a contract made in accordance with and be governed by the laws of the State of New York and shall come into full force and effect as of January 11, 1996 when signed by both parties.

STAINLESS FOUNDRY AND
ENGINEERING

ASARCO Incorporated

By Dianne Miller

By Dale Holscher
Director, Ore Department

GFA:bd
1/11/96

WISCONSIN DEPARTMENT OF NATURAL RESOURCES
SOUTHEAST DISTRICT

Richards Street Annex: 4041 North Richards Street
P.O. Box 12436
Milwaukee, WI 53212-0436

FAX #:(414) 229-0810

Solid & Hazardous Waste, Emergency & Remedial Response, Water Supply

Headquarters: 2300 North Dr. Martin Luther King Jr. Drive

P.O. Box 12436

Milwaukee, WI 53212-0436

FAX #:(414) 263-8483 Resource Management, Wastewater, Water Resources, Library, Environmental Analysis/Review

FAX #:(414) 263-8716 Air Management, Environmental Enforcement, Water Regulations & Zoning

FAX #:(414) 263-8606 District Director, Assistant District Directors, District Management, Finance, Purchasing, Personnel, Payroll, Public Information Officer, Information Center/License Sales

To: Susan Bohan Telephone: _____

Agency/Region: EPA Region VIII - Office of Enforcement

Telefax Machine Telephone Number: 303-312-6953

Subject: Asarco in Montana - I will be in the office

Wednesday pm if you have any questions

From: (Name) Sandy Miller

Office Phone Number: 414-229-0841

Date: 7/30/96

Number of Pages to Follow (Including Cover Sheet): _____

Cost for FAX = \$1.00 per page plus 5.5% tax

Pages plus cover () x \$1.00 = \$ _____

Tax 5.5% = \$ _____

Please make check payable to: The Department of Natural Resources

Send along with a copy of this page to:

Wisconsin Department of Natural Resources
2300 N. Dr. Martin Luther King Jr. Drive
P. O. Box 12436
Milwaukee, WI 53212
ATTN: M. Franson